

PATENT

Atty. Dkt. No. MRKS/D133

**REMARKS**

This is intended as a full and complete response to the Office Action dated June 6, 2006, having a shortened statutory period for response set to expire on July 6, 2006. Please reconsider the claims pending in the application for reasons discussed below.

In the specification, paragraph [0012] has been amended to correct minor editorial problems.

Claims 8-25 remain pending in the application after entry of this response. Claims 1-7 have been cancelled by Applicant. Reconsideration of the pending claims is requested for reasons presented below.

***Claim Rejections Under 35 U.S.C. § 102***

Claims 1-7 stand rejected under 35 U.S.C. § 102(b) as being clearly anticipated by *Ezell, et al.* (GB 231074) (see figure 2B; page 9, lines 8-15 and page 12, lines 3-15). Claims 1-7 have been cancelled by Applicant.

Claims 1, 2, and 4-7 stand rejected under 35 U.S.C. § 102(b) as being clearly anticipated by *Head* (U.S. 5,709, 269) (e.g., figures 8-11 and column 5, line 44 through column 6, line 21). Claims 1, 2, and 4-7 have been cancelled by Applicant.

Claims 1, 2, and 4-7 stand rejected under 35 U.S.C. § 102(b) as being anticipated by *Watson, et al.* (U.S. 5,398,763). Claims 1, 2, and 4-7 have been cancelled by Applicant.

***Claim Rejections Under 35 U.S.C. § 103***

Claim 3 is rejected under 35 U.S.C. § 103(a) as being unpatentable over *Head* '269 or *Watson, et al.* '763 in view of *Ezell, et al.* '074 or *Robison, et al.* (U.S. 6,755,249). Claim 3 has been cancelled by Applicant.

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***New Claims***

New claims 8-25 have been added to better define aspects of the invention. No new matter has been added.

The references cited by the Examiner neither alone nor in combination teach, show, or suggest the biasing member recited in claims 8-25.

*Head* (U.S. 5,709,269) discloses a first and a second locking member 3 and 4, a means for engaging the locking members with respect to one another and at least one of the first and second members being made of a dissolvable material adapted to expand radially in a locking position. *Head* does not have a biasing member which biases the locking member towards an unlocked position. Therefore, *Head* does not teach, show or suggest a biasing member for biasing the lock retainer to release the lock as recited in claims 8 – 25.

*Watson et al* (U.S. 5,398,763) discloses an annular baffle, and a setting tool adapted for releasing the baffle at a predetermined location in the well casing and an engaging means for engaging the well casing and supporting the baffle at the predetermined location. *Watson* does not have a biasing member. Therefore, *Watson* does not teach, show or suggest a biasing member for biasing the lock retainer to release the lock as recited in claims 8 – 25.

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### ***Conclusion***

Having addressed all issues set out in the office action, Applicant respectfully submits that the claims are in condition for allowance and respectfully request that the claims be allowed. In conclusion, the references cited by the Examiner, alone or in combination, do not teach, show, or suggest the invention as claimed.

Respectfully submitted,



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